

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

THE DIRECT MARKETING ASSOCIATION, INC.'S FOLLOW-UP
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS
DIRECTED TO USPS WITNESS TAYMAN
(DMA/USPS-T9-34)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Direct Marketing Association, Inc. hereby submits the attached follow-up interrogatory and request for production of documents to USPS witness Tayman (DMA/USPS-T9-34). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,



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Association, Inc.

September 22, 1997


Witness Tayman (USPS-T-9)

DMA/USPS-T9-34. Please refer to your response to DMA/USPS-T9-28.

- (a) Please explain in detail how the Postal Service calculates Total Factor Productivity.
- (b) Please list any factors other than capital and labor which are incorporated in the Total Factor Productivity.
- (c) Please provide a comparable data series showing labor productivity and explain how it is calculated.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 (section 3001.12) of the Postal Rate Commission's Rules of Practice and Procedure and Rule 3 of the Commission's Special Rules of Practice in this proceeding.


Michael D. Bergman

September 22, 1997